

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:20CR342
)	
Plaintiff,)	JUDGE BENITA Y. PEARSON
)	
v.)	
)	
ROBERT J. ROHRBAUGH, II)	
)	<u>JOINT PRELIMINARY STATEMENT</u>
Defendant.)	

Pursuant to this Court's pretrial order, the United States and Defendant Robert J. Rohrbaugh, II and his attorneys jointly submit the following Preliminary Statement.

Respectfully submitted,

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The United States alleges that Defendant ROBERT J. ROHRBAUGH, II committed violations of federal law as outlined in the Superseding Indictment.

Specifically, Count 1 alleges that Rohrbaugh conspired with others to obtain tax refund checks to which he was not entitled by filing federal income tax returns with the Internal Revenue Service that contained false and fictitious claims for tax refunds. The United States alleges in Count 2 that Rohrbaugh aided and abetted the theft of government property, specifically a \$1,352,779 tax refund check. Count 3 alleges that Rohrbaugh made a false claim against the United States by helping to present the unlawfully obtained \$1,352,779 tax refund check to KeyBank for payment. And Count 4 alleges that Rohrbaugh conspired with others to launder money by knowingly engaging in a series of financial transactions that involved the proceeds of the unlawful activity.

Defendant Rohrbaugh denies the allegations against him.